

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

EMMA KOE, individually and on )  
behalf of her minor daughter, AMY )  
KOE; HAILEY MOE, individually )  
and on behalf of her minor daughter, )  
TORI MOE; PAUL VOE; ANNA )  
ZOE, individually and on behalf of )  
her minor daughter, LISA ZOE; )  
TRANSPARENT, on behalf of its )  
members, )

Plaintiffs, )

v. )

CAYLEE NOGGLE, in her official )  
capacity as Commissioner of the )  
Georgia Department of Community )  
Health; GEORGIA DEPARTMENT )  
OF COMMUNITY HEALTH'S )  
BOARD OF COMMUNITY )  
HEALTH; NORMAN BOYD, )  
ROBERT S. COWLES III, DAVID )  
CREWS, RUSSELL )  
CRUTCHFIELD, )  
ROGER FOLSOM, NELVA LEE, )  
MARK SHANE MOBLEY, )  
CYNTHIA RUCKER, ANTHONY )  
WILLIAMSON, in their official )  
capacities as members of the Georgia )  
Department of Community Health's )  
Board of Community Health; )  
THE GEORGIA COMPOSITE )  
MEDICAL BOARD; JOHN S. )

Civil Action No.  
1:23-cv-02904-SEG

ANTALIS, SUBRAHMANYA BHAT,	)
WILLIAM BOSTOCK, KATHRYN	)
CHEEK, RUTHIE CRIDER,	)
DEBI DALTON, CHARMAINE	)
FAUCHER, AUSTIN FLINT,	)
SREENIVASULU GANGASANI,	)
JUDY GARDNER, ALEXANDER S.	)
GROSS, CHARLES E. HARRIS, JR.,	)
J. JEFFREY MARSHALL,	)
MATTHEW W. NORMAN,	)
BARBY J. SIMMONS, in their	)
official capacities as members of the	)
Georgia Composite Medical Board;	)
DANIEL DORSEY, in his official	)
capacity as the Executive Director of	)
the Georgia Composite Medical	)
Board,	)
	)
Defendants.	)

**MOTION TO INTERVENE AS PLAINTIFFS BY NANCY DOE,  
INDIVIDUALLY AND ON BEHALF OF HER MINOR DAUGHTER,  
LINDA DOE**

Pursuant to Fed. R. Civ. P. 24, Nancy Doe, individually and on behalf of her minor daughter Linda Doe moves for leave to intervene as a party plaintiff in this case.<sup>1</sup> In support of this motion, Ms. Doe relies upon her declaration (Ex. 1 to this Motion), the attached pleading that sets out the claim or defense for which intervention is sought (Ex. 2 to this Motion) as required by Rule 24(c), Fed. R. Civ.

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<sup>1</sup> Because of concerns about their privacy and safety, Ms. Doe and her minor daughter Linda are proceeding pseudonymously. *See* Motion for Leave to Proceed Under Pseudonyms, filed concurrently herewith.

P., and her Memorandum in Support, filed contemporaneously herewith. As set forth in greater detail in her Memorandum in Support, Ms. Doe respectfully requests that the Court grant this Motion and permit her to intervene as a plaintiff in this matter on her own behalf and on behalf of her minor daughter, Linda Doe.

This 5th day of July, 2023.

/s/ Edward D. Buckley

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*Counsel for Nancy Doe individually and on  
behalf of her minor daughter Linda Doe*

**LR 5.1(C) FONT COMPLIANCE CERTIFICATION**

The undersigned counsel certifies that the within and foregoing was prepared using Times New Roman 14-point font in accordance with Local Rule 5.1 of the United States District Court for the Northern District of Georgia.

/s/ Edward D. Buckley

Edward D. Buckley

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Georgia Composite Medical Board; )  
DANIEL DORSEY, in his official )  
capacity as the Executive Director of )  
the Georgia Composite Medical )  
Board, )  
Defendants. )

**CERTIFICATE OF SERVICE**

I hereby certify that on July 5, 2023, I electronically filed the foregoing MOTION TO INTERVENE AS PLAINTIFFS BY NANCY DOE, INDIVIDUALLY AND ON BEHALF OF HER MINOR DAUGHTER, LINDA DOE with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

/s/ Edward D. Buckley  
Edward D. Buckley  
Georgia Bar No. 092750  
edbuckley@bbwmlaw.com